

STATE GRAND JURY OF SOUTH CAROLINA

STATE OF SOUTH CAROLINA)	CASE NO. _____
)	
V.)	INDICTMENT FOR
)	UNLAWFUL DRUGS
BARRY DONELL REED, JR.,)	
(A/K/A "KING B"),)	Criminal Conspiracy
(A/K/A "GOAT"),)	S.C. Code Ann. § 16-17-410
(A/K/A "BJ");)	(1 Count)
ANTHONY ALVINO BREVARD;)	
(A/K/A "AMP BANKS"),)	Financial Transactions Involving
(A/K/A "BANKS");)	Property Derived from Drug Activity
SHARON LAVONNE TELFORD;)	(Money Laundering)
)	S.C. Code Ann. § 44-53-475(A)(1)
)	(5 Counts)
)	
DEFENDANTS.)	Possession with Intent to Distribute
)	Marijuana,
_____)	S.C. Code Ann. § 44-53-370(b)(2)
)	(2 Counts)
)	
)	Possession of a Firearm During the
)	Commission of or Attempt to Commit
)	a Violent Crime
)	S.C. Code Ann. § 16-23-490
)	(3 Counts)

At a session of the State Grand Jury of South Carolina, convened in Columbia, South Carolina, on February 15, 2018, the State Grand Jurors present upon their oath:

COUNT ONE
CRIMINAL CONSPIRACY TO COMMIT FINANCIAL TRANSACTIONS INVOLVING
PROPERTY DERIVED FROM UNLAWFUL DRUG ACTIVITY
(MONEY LAUNDERING)
S.C. Code Ann. § 16-17-410

BARRY DONELL REED, JR. (A/K/A "BJ", "KING B", "GOAT"), SHARON LAVONNE TELFORD, and other persons both known and unknown to the Grand Jury, in

Richland County, from on or about some time in May 2014 until the present, did knowingly and intentionally conspire and agree and have a tacit understanding and agreement between two or more persons, for the purpose of accomplishing an unlawful object, to wit: REED and TELFORD entered into a conspiracy with the object of laundering proceeds of REED's trafficking of illegal drugs, and such money laundering if achieved would violate South Carolina Code § 44-53-475.

All in violation of Section 16-17-410 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State; and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT TWO
FINANCIAL TRANSACTIONS INVOLVING PROPERTY DERIVED FROM
UNLAWFUL DRUG ACTIVITY
(MONEY LAUNDERING)
S.C. Code Ann. § 44-53-475(A)(1)

That BARRY DONELL REED, JR. (A/K/A "BJ", "KING B", "GOAT"), in Richland County, from January 1, 2017 through December 31, 2017, knowing that the property involved in a financial transaction represented the proceeds of, and was derived directly and indirectly from the proceeds of unlawful activity relating to narcotic drugs or controlled substances, did conduct and attempt to conduct a financial transaction which in fact involved the proceeds, with the intent to promote the carrying on of unlawful activity relating to narcotic drugs or controlled substances, and knowing that the transaction was designed in whole or in part to conceal or disguise the nature,

location, sources, ownership, and control of the proceeds of the unlawful activity; to wit: REED violated the aforementioned provisions by conducting financial transactions with the proceeds of his illegal drug trafficking through a business entity known as "Family Trucking LLC".

All in violation of Section 44-53-475 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State; and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT THREE
FINANCIAL TRANSACTIONS INVOLVING PROPERTY DERIVED FROM
UNLAWFUL DRUG ACTIVITY
(MONEY LAUNDERING)
S.C. Code Ann. § 44-53-475(A)(1)

That SHARON LAVONNE TELFORD in Richland County, from January 1, 2017 through December 31, 2017, knowing that the property involved in a financial transaction represented the proceeds of, and was derived directly and indirectly from the proceeds of unlawful activity relating to narcotic drugs or controlled substances, did conduct and attempt to conduct a financial transaction which in fact involved the proceeds, with the intent to promote the carrying on of unlawful activity relating to narcotic drugs or controlled substances, and knowing that the transaction was designed in whole or in part to conceal or disguise the nature, location, sources, ownership, and control of the proceeds of the unlawful activity; to wit: TELFORD did conduct

financial transactions with the proceeds of illegal drug trafficking through a business entity known as “Family Trucking LLC”.

All in violation of Section 44-53-475 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State; and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT FOUR
FINANCIAL TRANSACTIONS INVOLVING PROPERTY DERIVED FROM
UNLAWFUL DRUG ACTIVITY
(MONEY LAUNDERING)
S.C. Code Ann. § 44-53-475(A)(1)

That BARRY DONELL REED, JR. (A/K/A “BJ”, “KING B”, “GOAT”), in Richland County, from May of 2014 through January of 2018, knowing that the property involved in a financial transaction represented the proceeds of, and was derived directly and indirectly from the proceeds of unlawful activity relating to narcotic drugs or controlled substances, did conduct and attempt to conduct a financial transaction which in fact involved the proceeds, with the intent to promote the carrying on of unlawful activity relating to narcotic drugs or controlled substances, and with the knowledge that the transaction was designed in whole or in part to conceal or disguise the nature, location, sources, ownership, and control of the proceeds of the unlawful activity; to wit: REED violated the aforementioned provisions by conducting financial transactions with the

proceeds of his illegal drug trafficking through an financial account in the name of SHARON LAVONNE TELFORD.

All in violation of Section 44-53-475 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State; and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT FIVE
FINANCIAL TRANSACTIONS INVOLVING PROPERTY DERIVED FROM
UNLAWFUL DRUG ACTIVITY
(MONEY LAUNDERING)
S.C. Code Ann. § 44-53-475(A)(1)

That SHARON LAVONNE TELFORD in Richland County, from May of 2014 through January of 2018, knowing that the property involved in a financial transaction represented the proceeds of, and was derived directly and indirectly from the proceeds of unlawful activity relating to narcotic drugs or controlled substances, did conduct and attempt to conduct a financial transaction which in fact involved the proceeds, with the intent to promote the carrying on of unlawful activity relating to narcotic drugs or controlled substances, and with the knowledge that the transaction was designed in whole or in part to conceal or disguise the nature, location, sources, ownership, and control of the proceeds of the unlawful activity; to wit: TELFORD violated the aforementioned provisions by conducting financial transactions with the proceeds of illegal drug

trafficking through an financial account in her name.

All in violation of Section 44-53-475 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State; and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT SIX
FINANCIAL TRANSACTIONS INVOLVING PROPERTY DERIVED FROM
UNLAWFUL DRUG ACTIVITY
(MONEY LAUNDERING)
S.C. Code Ann. § 44-53-475(A)(1)

That BARRY DONELL REED, JR. (A/K/A “BJ”, “KING B”, “GOAT”), in Richland County, from April of 2014 through November of 2017, knowing that the property involved in a financial transaction represented the proceeds of, and was derived directly and indirectly from the proceeds of unlawful activity relating to narcotic drugs or controlled substances, did conduct and attempt to conduct a financial transaction which in fact involved the proceeds, with the intent to promote the carrying on of unlawful activity relating to narcotic drugs or controlled substances, and with the knowledge that the transaction was designed in whole or in part to conceal or disguise the nature, location, sources, ownership, and control of the proceeds of the unlawful activity; to wit: REED violated the aforementioned provisions by conducting financial transactions with the proceeds of illegal drug trafficking through an financial account in his name.

All in violation of Section 44-53-475 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State; and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT SEVEN
POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA
S.C. Code Ann. § 44-53-370(b)(2)

That ANTHONY ALVINO BREVARD (A/K/A “AMP BANKS”, “BANKS”) did, in Richland County, on or about March 26, 2017, knowingly possess with intent to distribute, dispense, and deliver a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as amended.

All in violation of Section 44-53-370 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State; and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT EIGHT
POSSESSION WITH INTENT TO DISTRIBUTE MARIJUANA
S.C. Code Ann. § 44-53-370(b)(2)

That BARRY DONELL REED, JR. (A/K/A “KING B”, “GOAT”, “BJ”) did, in Richland County, on or about March 26, 2017, knowingly possess with intent to distribute, dispense, and deliver a quantity of marijuana, a controlled substance under the provisions of § 44-53-110, *et seq.*, Code of Laws of South Carolina (1976), as amended.

All in violation of Section 44-53-370 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State; and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT NINE
POSSESSION OF A FIREARM DURING THE COMMISSION OF
OR ATTEMPT TO COMMIT A VIOLENT CRIME
S.C. Code Ann. § 16-23-490

That ANTHONY BREVARD (A/K/A “AMP BANKS”, “BANKS”) did, in Richland County, on or about March 26, 2017, possess, constructively or physically, or visibly display a firearm during the commission of or attempt to commit a violent crime to wit: ANTHONY BREVARD (A/K/A “AMP BANKS”, “BANKS”) did possess a Springfield 1911 .45 caliber handgun (bearing serial number NM396565) during the commission of and in furtherance of a

marijuana trafficking conspiracy.

All in violation of Section 16-23-490 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State; and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT TEN
POSSESSION OF A FIREARM DURING THE COMMISSION OF
OR ATTEMPT TO COMMIT A VIOLENT CRIME
S.C. Code Ann. § 16-23-490

That ANTHONY BREVARD (A/K/A “AMP BANKS”, “BANKS”) did, in Richland County, on or about March 26, 2017, possess, constructively or physically, or visibly display a firearm during the commission of or attempt to commit a violent crime to wit: ANTHONY BREVARD (A/K/A “AMP BANKS”, “BANKS”) did possess a Sig Sauer p320 .357 caliber handgun (bearing serial number 58H031835) during the commission of and in furtherance of a marijuana trafficking conspiracy.

All in violation of Section 16-23-490 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State;

and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

COUNT ELEVEN
POSSESSION OF A FIREARM DURING THE COMMISSION OF
OR ATTEMPT TO COMMIT A VIOLENT CRIME
S.C. Code Ann. § 16-23-490

That ANTHONY BREVARD (A/K/A “AMP BANKS”, “BANKS”) did, in Richland County, on or about March 26, 2017, possess, constructively or physically, or visibly display a firearm during the commission of or attempt to commit a violent crime to wit: ANTHONY BREVARD (A/K/A “AMP BANKS”, “BANKS”) did possess a Kel Tec Sub 2000 9mm caliber handgun (bearing serial number E5E38) during the commission of and in furtherance of a marijuana trafficking conspiracy.

All in violation of Section 16-23-490 of the South Carolina Code of Laws, and such conduct not having been authorized by law; and such conduct involving and arising out of and in connection with a crime involving narcotics, dangerous drugs, or controlled substances, and such crime being of a multi-county nature and having significance in more than one county of this State; and such conduct involving criminal gang activity or a pattern of criminal gang activity.

Against the peace and dignity of this State and contrary to the law in such case made and provided.

A _____ Bill



ALAN WILSON
ATTORNEY GENERAL

FOREMAN